

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Year 2000 Biennial Regulatory Review)	
Amendment of Part 22 of the)	WT Docket No. 01-108
Commission's Rules to Modify or)	
Eliminate Outdated Rules Affecting)	
the Cellular Radiotelephone Service)	
and other Commercial Mobile Radio)	
Services)	

REPLY COMMENTS OF EDS CORPORATION

EDS Corporation ("EDS") hereby submits its reply comments in the above-referenced proceeding¹ in which the Commission proposes to eliminate the analog compatibility standard. EDS is one of the world's leading providers of information technology services. EDS is also a major supplier of IT services to the communications industry, and is regarded as the premier provider of mobile support services in the U.S. market. This status has been achieved through development of a successful communications framework and infrastructure for several major clients who are considered pioneers in the telematics service industry. Thus, EDS has first-hand experience which enables it to understand the impact of the proposed change in standards on cellular carrier service provision and affected customers. EDS agrees with the parties filing initial comments in this proceeding that advocate allowing a reasonable transition period to minimize any potentially adverse effects of eliminating the analog compatibility requirement.

¹ Year 2000 Biennial Regulatory Review - Amendment of Part 22 of the Commission's Rules to Modify or Eliminate Outdated Rules Affecting the Cellular Radiotelephone Service and other Commercial Mobile Radio Services, *Notice of Proposed Rulemaking*, WT Docket No. 01-108 (released May 17, 2001) ("NPRM").

I. INSTITUTING A REASONABLE TRANSITION PERIOD SHOULD MITIGATE POTENTIAL ADVERSE EFFECTS OF ELIMINATING THE ANALOG COMPATIBILITY STANDARD.

A number of commenters support a reasonable transition period rather than an abrupt elimination of the analog compatibility standard. These commenters include wireless carriers such as Sprint PCS and Verizon Wireless, both of whom acknowledge current widespread dependence on analog technology.²

The comments of CaseNewHolland Inc. (“CNH”) and OnStar Corporation (“OnStar”), among others, discuss specifically how telematics applications are dependent upon the nationwide presence of standard-based analog cellular service.³ Notwithstanding the recent proliferation of digital wireless service, the lack of standardization and nationwide coverage render it unsuitable for telematics applications at this time.⁴ In addition, according to many telematics service providers, digital service is not yet robust enough to offer the functionality they require.⁵ Allowing a reasonable transition period would provide time for digital wireless coverage and functionality to improve so it may develop into a viable technology base for telematics service.

Moreover, a reasonable transition period would help mitigate other unique issues that telematics service providers, in particular, would face upon migration from an AMPS-based network to a digital network. OnStar, CNH and Deere, for example, note that AMPS-based

² Comments of Sprint PCS filed July 2, 2001 in WT Docket No. 01-108 at pp. 2-4; Comments of Verizon Wireless filed July 2, 2001 in WT Docket No. 01-108 at pp. 3-5.

³ See Comments of CaseNewHolland Inc. filed July 2, 2001 in WT Docket No. 01-108 at pp. 1-2 (“CNH Comments”); Comments of OnStar Corporation filed July 2, 2001 in WT Docket No. 01-108 at p. 2 (“Onstar Comments”).

⁴ See, e.g., Comments of Deere & Company filed July 2, 2001 in WT Docket No. 01-108 at pp. 8-9 (“Deere Comments”); Comments of OnStar at p. 6.

⁵ Comments of ATX Technologies, Inc. filed July 2, 2001 in WT Docket No. 01-108 at p. 14 (“ATX Comments”); Deere Comments at p. 6; OnStar Comments at p. 5.

telematics systems are embedded in vehicles and heavy equipment. Unlike traditional wireless consumers who can switch technologies by simply purchasing a new handset, transitioning to a new technology is more complex for telematics service providers because they need to account for telematics systems integrated in legacy vehicles.⁶ Any migration to a new technology must avoid “stranding” legacy vehicles employing AMPS-based technology. Instituting a reasonable transition period would allow time to consider and resolve the issues presented by legacy vehicles.⁷

In addition, the length of the vehicle development cycle must also be taken into account in order for telematics service providers to smoothly transition to new technology. This is the length of time it would take manufacturers to develop, validate and build compatible vehicles with the new technology, having obtained through various tests the assurance that the telematics service would operate properly in a wide range of climatic and road conditions over the life of the vehicle.⁸ Thus, telematics service providers would also need a reasonable time to develop, test, and integrate new technology into their vehicles to migrate from AMPS to a new technology to ensure that neither their service nor their customers would be adversely impacted by any transition.⁹

II. CONCLUSION

EDS supports those comments which advocate allowing a reasonable transition period before eliminating the analog compatibility requirement. This period would allow digital wireless service to attain coverage and functionality equivalent to that of AMPS for telematics

⁶ Deere Comments at pp. 9-10; OnStar Comments at pp. 6-7.

⁷ ATX Comments at p. 16.

⁸ OnStar Comments at p. 6.

service providers and would facilitate an orderly transition to such technology, while minimizing any potential adverse impact to existing telematics service providers and their customers.

Respectfully submitted,

/s/

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